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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KONECRANES GLOBAL CORPORATION,  
Plaintiff,  
vs.  
MODE TECH (Beijing) Co., Ltd.,  
Defendant

Case No.: 2:18-cv-02015-GMN-NJK

**STIPULATION AND ORDER FOR  
MODIFICATION OF BRIEFING  
SCHEDULE AND CLAIM  
CONSTRUCTION HEARING MATTERS  
(ECF NO. 107)**

#### (Fourth Request)

Pursuant to LR IA 6-1 and LPR 1-3, Plaintiff Konecranes Global Corporation (“Konecranes”) and Defendant Mode Tech (Beijing) Co., Ltd. (“Mode Tech” and together, the “Parties”) agree and respectfully request an additional three-week extension of Claim Construction briefing deadlines and a corresponding continuance of the Patent Tutorial and Claim Construction hearings (currently unscheduled) (ECF Nos. 98, 105, 107), due to renewed settlement discussions along with continued travel-related concerns of counsel for the Parties in connection with the coronavirus (COVID-19) pandemic and related limitations. This is the parties’ fourth request.

Specifically, the Parties' respective counsel have discussed and agreed to an approximate three-week extension of the Briefing Deadlines to allow the Parties to further

1 explore recent settlement developments as well as to reschedule the deposition of Konecranes'  
2 expert Emil Geiger from its current June 26, 2020 date for the same travel-related concerns.<sup>1</sup>  
3 The Parties have correspondingly stipulated and agreed to extend Mode Tech's deadline to file  
4 its Claim Construction Responsive Brief from July 10, 2020 to July 31, 2020 and Konecranes'  
5 deadline to file its Claim Construction Reply Brief from July 17, 2020 to August 7, 2020 (ECF  
6 No. 107). Accordingly, the Parties respectfully request that the Court grant this Stipulation and  
7 also continue the Patent Tutorial and Claim Construction hearings for approximately three  
8 additional weeks to a date convenient to the Court.

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28 <sup>1</sup> Mr. Geiger's deposition was scheduled to take place in Reno, Nevada.

1           In accordance with the Court's prior Order (ECF No. 107), the Parties shall jointly file  
2 a Notice with the Court upon completion of briefing on August 10, 2020, identifying three  
3 proposed dates for the Patent Tutorial and Claim Construction hearings for the Court's  
4 consideration and further coordination.

5           DATED this 22nd day of June, 2020.

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Ltd.

IT IS SO ORDERED.

Dated this 25 day of June, 2020.

Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT